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*Attorneys for Third Defendants
City Ocean Logistics Co. Ltd., and
City Ocean International, Inc.*

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

NIKE, INC.,	:	
	:	
Plaintiff,	:	Civil Action No.
	:	2:11-CV-04390-CCC-JAD
	:	
-against-	:	
	:	THIRD PARTY DEFENDANTS,
EASTERN PORTS CUSTOM BROKERS, INC.	:	CITY OCEAN LOGISTICS
and VARIOUS JOHN DOES, JANE DOES,	:	CO. LTD, AND CITY OCEAN
and XYZ COMPANIES	:	INTERNATIONAL INC.'S,
	:	ANSWER TO THIRD PARTY
Defendants,	:	DEFENDANT, CHINA SHIPPING
	:	CONTAINER LINES CO.'S
-----	:	CROSS-CLAIM
	:	
EASTERN PORTS CUSTOM BROKERS, INC.	:	
	:	
Third-Party Plaintiff,	:	
	:	
-against-	:	
	:	
CHINA SHIPPING CONTAINER LINES CO.,	:	
LTD., CITY OCEAN INTERNATIONAL INC.	:	
CITY OCEAN LOGISTICS CO., LTD., and	:	
U.S. CUSTOMS AND BORDER	:	
PROTECTION	:	
	:	
Third-Party Defendants.	:	
	:	
	:	

Defendants CITY OCEAN INTERNATIONAL INC., and CITY OCEAN
LOGISTICS CO., LTD., (herein "Third Party Defendants" or "City Ocean"), by and

through their attorneys, WANG, GAO & ASSOCIATES, P.C. hereby answer the Third Party Defendant's Cross-Complaint as follows:

CROSS-CLAIM AGAINST CITY OCEAN INTERNATIONAL, INC.

1. Admit.
2. City Ocean lacks sufficient knowledge to form a belief as to the truth that Cross-claimant, China Shipping Container Lines Co. Ltd. ("CSCL") is a Chinese ocean carrier with a principal place of business at 450 Fushan Road, Pudong, Shanghai, People's Republic of China.
3. City Ocean lacks sufficient knowledge to admit or deny the claim that the cross-claims are subject to the same jurisdiction as the Third Party Complaint.
4. City Ocean admits that venue is proper under 28 U.S.C. §§ 1391(b) and 1391(c), but lacks sufficient knowledge to admit or deny whether venue is proper for the cross-claim.
5. Admit that City Ocean acted as the freight forwarder for cargoes shipped, but lacks sufficient knowledge to admit or deny whether this was pursuant to CSCL Waybills YTN NYC 100140 and YTN NYC 100281.
6. City Ocean lacks sufficient knowledge to admit or deny the allegations set forth in this paragraph.
7. Denied.
8. Denied.
9. Denied.
10. City Ocean lacks sufficient knowledge to admit or deny the allegation set forth in this paragraph.

11. City Ocean lacks sufficient knowledge to admit or deny the allegation set forth in this paragraph.
12. Denied.
13. Denied.

AFFIRMATIVE DEFENSES

14. Third Party Defendant fails to state a claim upon which relief may be granted.
15. The Court lacks personal jurisdiction.
16. Third Party Defendant's claims are barred by the doctrine of waiver.
17. Third Party Defendant's claims are barred by the doctrine of unclean hands.
18. Third Party Defendant's claims are barred by the doctrine of estoppel.
19. Third Party Defendant's claims are barred by the doctrine of laches.
20. Third Party Defendant's claims are barred by assumption of risk.
21. Third Party Defendant failed to mitigate damages.
22. Third Party Defendant breached the contract.
23. Third Party Defendant fails to join a party, without whom, the action cannot proceed.
24. The Third Party Defendant's Cross-claim is frivolous.
25. City Ocean claims the benefit of all defenses raised by any other defendant or third party defendant herein insofar as may be applicable to it.
26. City Ocean hereby gives notice of their intent to reply on such other and further affirmative defenses as may appear applicable through pre-trial proceedings, further investigation, discovery, or otherwise in this case hereby reserve the right to amend this Third Party Answer to reflect any such defenses on the matter.

Dated: March 5, 2012

/S/ HENG WANG
HENG WANG, Esq. (HW0786)
Wang, Gao & Associates, P.C.

*Attorneys for Third Party Defendant
City Ocean Logistics, Co. Ltd. and
City Ocean International, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on March 5, 2012, I caused a true copy of the foregoing CITY OCEAN LOGISTICS CO. LTD and CITY OCEAN INTERNATIONAL, INC.'S ANSWER TO THIRD PARTY DEFENDANT CHINA SHIPPING CONTAINER LINES CO.'S CROSS-CLAIM to be served via ECF upon all parties receiving such notice.

By: /s/ Heng Wang

Heng Wang, Esq.